

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SYMBOLGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:16-cv-0450-JRG
	§	
vs.	§	LEAD CASE
	§	
CITIBANK, NA	§	
	§	
Defendant.	§	
	§	
_____ SYMBOLGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:16-cv-0599-JRG
	§	
vs.	§	CONSOLIDATED CASE
	§	
KWIKSET CORPORATION	§	
	§	
Defendant.	§	
_____	§	

JOINT MOTION TO DISMISS

Under Federal Rule of Civil Procedure 41(a), Symbology Innovations, LLC (“SI”) and Spectrum Brands, Inc. (that now wholly owns Kwikset Corporation, the entity originally named in this action) (“Spectrum/Kwikset”) move to dismiss SI’s claims against Spectrum/Kwikset with prejudice, and Spectrum/Kwikset’s claims against SI without prejudice, with each party bearing its own attorneys’ fees and costs.

Dated: March 8, 2017

Respectfully submitted,

/s/ Jay Johnson

Jay Johnson
State Bar No. 24067322
Brad Kizzia
State Bar No. 11547550
KIZZIA JOHNSON PLLC
1910 Pacific Ave., Suite 13000
Dallas, TX 75201
(214) 451-0164
Fax: (214) 451-0165
jay@kjpllc.com
bkizzia@kjpllc.com

**ATTORNEYS FOR PLAINTIFF
SYBOLOGY INNOVATIONS
LLC**

/s/ Allen F. Gardner

Allen Franklin Gardner
Gillam & Smith LLP
102 N College, Suite 800
Tyler, TX 75702
903-934-8450
Fax: 903-934-9257
Email: allen@gillamsmithlaw.com

**ATTORNEY FOR KWIKSET
CORPORATION**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on March 8, 2017.

/s/ Jay Johnson

Jay Johnson